

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, TYLER MAGILL, APRIL  
MUNIZ, HANNAH PEARCE, MARCUS  
MARTIN, JOHN DOE, JANE DOE 1, JANE  
DOE 2, and JANE DOE 3,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSELY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS,  
LEAGUE OF THE SOUTH, JEFF SCHOEP,  
NATIONAL SOCIALIST MOVEMENT,  
NATIONALIST FRONT, AUGUSTUS SOL  
INVICTUS, FRATERNAL ORDER OF THE  
ALT-KNIGHTS, MICHAEL “ENOC”  
PEINOVICH, LOYAL WHITE KNIGHTS OF  
THE KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**JURY TRIAL DEMANDED**

**MOTION FOR PRO HAC VICE ADMISSION OF DAVID E. MILLS**

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the Western District of Virginia, I, Robert T. Cahill, an attorney admitted to practice in this Court, and counsel of record in the instant proceeding, hereby move the Court for the admission of

David E. Mills, Esquire to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof state as follows:

1. Mr. Mills is a partner with Cooley LLP, 1299 Pennsylvania Avenue, NW, Suite 700, Washington, DC 20004, Tel: (202) 842-7800, Fax: (202) 842-7899, Email: dmills@cooley.com.

2. Mr. Mills is qualified and licensed to practice law and is a member in good standing with the bars of Maryland (Bar No. not applicable) and the District of Columbia (Bar No. 401979).

3. Mr. Mills agrees to submit to and comply with the appropriate rules of procedure as required in the case for which he is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit David E. Mills to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: November 3, 2017

Respectfully submitted,

s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

COOLEY LLP

11951 Freedom Drive, 14th Floor

Reston, VA 20190-5656

Telephone: (703) 456-8000

Fax: (703) 456-8100

Email: rcahill@cooley.com

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 3, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I hereby certify, on this same date, that I have also served the following non-ECF participants, via U.S. mail, First Class and postage prepaid, addressed as follows:

Nathan Damigo  
14773 Orange Blossom Rd  
Oakdale, CA 95361

Matthew Parrott  
a/k/a David Matthew Parrott  
950 S. Ridgecrest Lane  
Paoli, IN 47454

Jeff Schoep  
Nationalist Front f/k/a Aryan National Alliance  
National Socialist Movement  
22803 Rausch Avenue  
Eastpointe, MI 48021

Michael Hill a/k/a James Michael Hill  
146 Bridgewood Drive  
Killen, AL 35645

Loyal White Knights of the Ku Klux Klan  
a/k/a Loyal White Knights Church of Invisible Empire Inc.  
c/o Registered Agent United States Corporation Agents, Inc.  
6135 Park South Drive  
Charlotte, NC 28210

Michael Peinovich  
a/k/a Michael "Enoch" Peinovich  
519 E. 82nd Street, Apt 2C  
New York, NY 10028

Michael Tubbs  
League of the South  
524 Cole Road W  
Jacksonville, FL 32218

James Alex Fields, Jr. - inmate  
(Offender ID no. 1913360)  
Albemarle-Charlottesville Regional Jail  
160 Peregory Lane  
Charlottesville, VA 22902

Christopher Cantwell – inmate  
(Offender ID no. 1915204)  
Albemarle-Charlottesville Regional Jail  
160 Peregory Lane  
Charlottesville, VA 22902

Identity Europa, Inc.  
a/k/a Identity Evropa  
c/o Registered Agent LegalZoom.com, Inc.  
101 N. Brand Blvd, 11th Floor  
Glendale, CA 91203

Elliot Kline  
a/k/a Eli Mosely and/or Eli Mosley  
117 Mesa Drive  
Reading, PA 19608

Robert Ray  
(a/k/a Robert "Azzmador" Ray and Robert Warren Ray)  
22345 Cherry Lane  
Frankston, Texas 75763

Traditionalist Worker Party  
Registered agent: Thomas Buhls  
2517 Federal Road  
Benson, North Carolina 27504

*s/ Robert T. Cahill*

Robert T. Cahill (VSB 38562)  
COOLEY LLP  
11951 Freedom Drive, 14th Floor  
Reston, VA 20190-5656  
Telephone: (703) 456-8000  
Fax: (703) 456-8100  
Email: rcahill@cooley.com

*Counsel for Plaintiffs*